

Exhibit A

From: ECFnotice@mad.uscourts.gov
Subject: Activity in Case 1:16-cv-12383-IT Hashem v. D'Angelo Memorandum in Support of Motion
Date: October 23, 2018 at 10:36 AM
To: CourtCopy@mad.uscourts.gov



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United States District Court

District of Massachusetts

Notice of Electronic Filing

The following transaction was entered by Farrah, Albert on 10/23/2018 at 10:35 AM EDT and filed on 10/23/2018

Case Name: Hashem v. D'Angelo

Case Number: 1:16-cv-12383-IT

Filer: Saba Hashem

Document Number: 145

Docket Text:

MEMORANDUM in Support re [144] Second MOTION for Contempt and Sanctions filed by Saba Hashem. (Farrah, Albert)

1:16-cv-12383-IT Notice has been electronically mailed to:

Albert L. Farrah alf@farrah-law.com

Joshua A. Burnett jburnettlaw@comcast.net

Matthew R. Braucher mbraucher@ba-lawgroup.com

Mernaysa Rivera-Bujosa mernaysa@riverabujosalaw.com

Wendy A. Kaplan wendykaplan@aol.com, admin@wendykaplan.com, briggenslaw@gmail.com, galeglazer@aol.com, louisfont@aol.com

William J. Amann wamann@ba-lawgroup.com, cshaw@ba-lawgroup.com

1:16-cv-12383-IT Notice will not be electronically mailed to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:yes

Electronic document Stamp:

[STAMP dcecfStamp_ID=1029851931 [Date=10/23/2018] [FileNumber=7935029-0] [73bba9e28c61ea912bb7cf22dacda3c194e71b6adf7442c47861e554b71fc44bc982d70d2a6015f6171dad1d2046207bf69d9dc36ff7bd35724862875bac65f5]]

Exhibit B

From: Farrah alf@farrah-law.com
Subject: Re: Law360 reporter writing about Hashem v. D'Angelo case
Date: October 24, 2018 at 11:35 AM
To: Aaron Leibowitz aaron.leibowitz@law360.com



Mr. Leibowitz, It is my policy not to comment on pending litigation. I would like a copy of your article once it has run. Thank you.
Albert Farrah

Albert L. Farrah, Jr.
Farrah & Farrah
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Boston, MA 02116
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www.farrah-law.com

Direct Line: 617-694-1549
alf@farrah-law.com

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978-689-0007

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On Oct 24, 2018, at 11:15 AM, Aaron Leibowitz <aaron.leibowitz@law360.com> wrote:

Hi Mr. Farrah,

I am a reporter with Law360 based in Boston and am writing a story today about the ongoing litigation involving your client Saba Hashem and Stephen D'Angelo.

Today's story will lead with Mr. Hashem's filing yesterday demanding nearly \$15,000 for attorneys' fees plus sanctions. I will also provide background on the case, including Mr. Hashem's domestic violence conviction and the nature of the main ongoing dispute.

I wanted to give you and/or Mr. Hashem a chance to comment for the story, if you would like. Please let me know by email or at 914-960-2739. My deadline is around 1 pm.

Thank you,

Aaron Leibowitz

--

Aaron Leibowitz

7/10/11 10:00 AM

Reporter, Boston courts

Legal News & Data

111 W. 19th Street, 5th Floor

New York, NY 10011

914-960-2739

Exhibit C

From: Aaron Leibowitz aaron.leibowitz@law360.com
Subject: Re: Law360 reporter writing about Hashem v. D'Angelo case
Date: October 25, 2018 at 9:51 AM
To: alf@farrah-law.com

AL

Hi Mr. Farrah,

Here is the link: <https://www.law360.com/articles/1094962>

Since you will not be able to see the full text without a subscription, below is the text of the article, so you have it.

Suspended Atty Seeks Sanctions On Ex-Partner In Fee Fight

Law360 (October 24, 2018, 5:34 PM EDT) -- A lawyer suspended from the Massachusetts bar after being convicted of assaulting his girlfriend said in a court filing Tuesday that his former partner is refusing to pay him fees for previous work in contempt of a federal judge's order.

Saba Hashem, who served a six-month jail term, sued his ex-partner for payments from personal injury cases and others he worked on previously. He said Stephen D'Angelo has defied U.S. District Judge Indira Talwani's Oct. 1 judgment awarding him almost \$4,000 in fees.

Hashem is demanding sanctions of \$1,000 per day for a total payment of almost \$15,000.

"Twenty one days have passed since the court's order and, in what has become an all too familiar expression of contempt for the court and other parties, the D'Angelo defendants have refused to make payment," the filing says.

In June, Judge Talwani also awarded Hashem almost \$6,000 in fees, but Hashem said D'Angelo has refused to make that payment as well, and has not been cooperative in the discovery process.

"There is no need for another recitation of the D'Angelo defendants' continuing disdain for this process and the court, and no need to explain why the relief sought is appropriate, except to say that plaintiff hereby incorporates by reference the arguments made in his earlier motions for sanctions against the D'Angelo defendants as if set forth herein," Hashem said Tuesday.

D'Angelo, who has offices in Boston, has said Hashem is entitled to reasonable payments for his work at their former firm, D'Angelo & Hashem LLC, but has argued Hashem had no standing to bring a suit for breaches of fiduciary duty because he was suspended from the bar when he filed it.

Hashem pled guilty in 2015 to domestic assault and battery for choking his girlfriend — who was his former client — in her apartment. He was sentenced to six months in jail and two years on supervised probation.

The Massachusetts Supreme Judicial Court cleared Hashem to work as a paralegal in June, according to online records from the Massachusetts Board of Bar Overseers, but

came, according to online records from the Massachusetts Board of Bar Overseers, but he remains unlicensed as an attorney.

"Mr. Hashem is legally entitled to quantum meruit on cases that he worked on before his suspension," D'Angelo said in a January 2017 motion to dismiss. "He is legally and ethically entitled to nothing more, but that is what he seeks in this lawsuit."

Judge Talwani sent the case to alternative dispute resolution in August, but the parties could not reach an agreement.

Adding a layer to the litigation is an intervenor, Jennifer Carrion, a former receptionist at D'Angelo & Hashem who says the men owe her \$544,000 after a 2011 jury verdict found that Hashem and the firm were liable for pregnancy discrimination against her. That ruling was partially upheld by the Massachusetts Appeals Court, with a retaliation claim dismissed.

"Neither Hashem nor [D'Angelo & Hashem] has paid Carrion a cent," she said in an April 2017 filing.

Carrion filed a second motion to compel discovery last week after her first one was denied.

Attorneys for Hashem and D'Angelo declined to comment Wednesday. An attorney for Carrion could not immediately be reached.

Hashem is represented by William J. Amann, Matthew R. Braucher and Joshua A. Burnett of Braucher & Amann PLLC.

D'Angelo is represented by Albert L. Farrah Jr. of Farrah & Farrah.

Carrion is represented by Wendy A. Kaplan of the Law Office of Wendy A. Kaplan and Mernaysa Rivera-Bujosa of Rivera Bujosa Law PC.

The case is Hashem v. D'Angelo, case number 1:16-cv-12383, in the U.S. District Court for the District of Massachusetts.

--Editing by Dlpti Coorg.

On Thu, Oct 25, 2018 at 7:27 AM AlbertFarrah <alf@farrah-law.com> wrote:
Hi. Can not open article. Could you send directly to me. Thanks. Al Farrah

Sent from my iPhone

On Oct 24, 2018, at 11:37 AM, Aaron Leibowitz <aaron.leibowitz@law360.com> wrote:

Thanks for your response. I'll be happy to share a link once it's up.

Best,
Aaron

On Wed, Oct 24, 2018 at 11:35 AM Farrah <alf@farrah-law.com> wrote:

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Albert L. Farrah, Jr.
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Reporter, Boston courts

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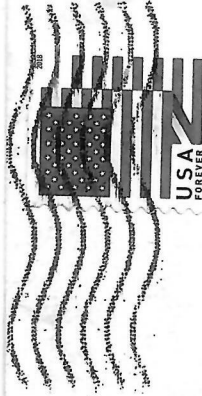
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Exhibit D

D'Angelo Law Group LLC
401 Andover St Ste 202
North Andover, MA 01845

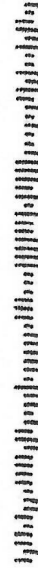
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24 OCT 2015 PM 3 L



Albert Farrah Jr.
Farrah & Farrah
321 Columbus Avenue
Boston, MA 02116

02116-51699



TD Bank **OFFICIAL CHECK** 20745548-8

RE: DANGELO LAW GROUP LLC

DATE: 10/24/2018

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MP

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